

**Response of  
Wisconsin Power and Light Company  
to  
The Public Service Commission of Wisconsin  
Data Request No. 1.09**

Docket Number: 05-CE-137  
Date of Request: January 29, 2009  
Information Requested By: Ken Detmer  
Date Responded: February 16, 2009  
Author: Eric Guelker  
Author's Title: Mgr Environmental Services  
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Witness: (If other than Author)

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p. 16 par. 3: In docket 05-CE-118 April 2008 status report it was mentioned on p. 5 of 6 that average emission levels were .146 which is slightly higher than the .16 lb/MMBTU stated in the application. Please discuss.

**Response:**

All of the NOx emission data is derived directly from Unit 5's continuous emission monitor system (CEMs). The 0.146 lb/MMBTU NOx emission rate referenced in the docket 05-CE-118 April 2008 status report is equal to the weighted (by hourly MMBTU) average rate observed during the first six months of 2007 after the separated over fire air (SOFA) system was installed. The 0.160 lb/MMBTU NOx emission rate presented in the CA application refers to the approximate annual average (using a simple not a weighted by hourly MMBTU average) NOx emission rate for year 2007 - the most recently completed full year of operation at that time. The actual 2007 emissions rate calculated using this approach is equal to 0.159 lb/MMBTU.

WPL believes using emissions rates calculated using the weighted (by hourly MMBTU) average approach are more appropriate and consistent with the calculation required to demonstrate compliance with the Reasonably Available Control Technology (RACT) requirements (see NR 428). Using this approach, the actual 2007 and 2008 emission rates are equal to 0.146 lb/MMBTU and 0.147 lb/MMBTU respectively.